

MAY 20 1999

Bruce Venner, Chief
Bureaus of Federal Case Management
Departments of Environmental Protection
P. O. Box 028
Trenton, New Jersey 08625

Re: L.E. Carpenter Superfund Site, Wharton Borough, Morris
County, New Jersey

Dear Mr. Venner:

This letter is to bring to your attention several issues regarding the L.E. Carpenter Superfund Site in Wharton Borough, Morris County, New Jersey. As you know, the New Jersey Department of Environmental Protection signed a Record of Decision (ROD) in April 1994. The selected remedy was Alternative 4, floating product removal, extraction of contaminated groundwater, above ground biological enhanced treatment and excavation of hot spots. Page 23 of the ROD stipulates the overall groundwater extraction/treatment remedy will only "occur after all immiscible products have been removed through an active recovery system." Based on the performance history of two on-site immiscible product recovery systems, the latest of which was "enhanced" in late 1997, product recovery has consistently decreased from a level of several hundred gallons to as little as 14 gallons during recent months. This is surprising given the several acre size of the impacted area. Moreover, Potentially Responsible Party quarterly monitoring reports indicate product thickness has changed relatively little within the impacted area, and that the maximum product thickness has remained relatively consistent at three to five feet thick. The reports fail to estimate the volume of remaining product so it is difficult to assess overall remedial progress, including estimating the period of time it may take to remediate the immiscible product, however it is clear that a site-wide groundwater remedy will not be implemented for quite some time.

Please note that EPA is committed to assist the NJDEP, and we might be able to suggest additional remedial actions that will help to expedite the overall site cleanup process, including use of a multiple phase recovery system, or excavation. In addition, as EPA has a new geologist assigned to the site, my project manager has been trying to schedule a site visit, however, despite numerous attempts, he has been unable to arrive at a

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convenient time that your site manager and the Potentially Responsible Party's (PRP's) contractor are available. As per the PRP's long-standing request, both your site manager and their contractor are supposed to accompany EPA staff on site visits. If scheduling a site visit during the next several weeks still proves to be inconvenient for your site manager, I request that EPA personnel be allowed to visit the site on their own, with adequate advance notice. I appreciate your assistance on this matter.

Please feel free to contact me to discuss this matter further at (212) 637-4420, or have your staff contact Stephen Cipot, of my staff, at (212) 637-4411, to discuss this matter further.

Sincerely yours,

Carole Petersen, Chief
New Jersey Remediation Branch

cc: Roman Luzecky, NJDEP
Gwen Barunas, NJDEP

bcc: Stephen Cipot, SNRJS